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17 SUPERIOR COURT OF THE STATE OF WASHINGTON
18 FOR THURSTON COUNTY
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20 WASHINGTON FAMILIES STANDING
21 TOGETHER and ANNE LEVINSON,

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23 Plaintiffs,

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25 v.

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27 SECRETARY OF STATE SAM REED, in
28 his official capacity, and PROTECT
29 MARRIAGE WASHINGTON,

30
31 Defendants.
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No. 09-2-02145-4

DECLARATION OF MICHAEL SNYDER
IN SUPPORT OF PLAINTIFFS' REPLY

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35 I, Michael Snyder, declare:

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37 1. I am an experienced election observer. I have personal knowledge of the
38 facts set forth in this declaration and am competent to testify thereto.
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41 2. I have observed election activities in Washington State since 1990. My
42 experience includes observing the signature verification process for several ballot measures
43 submitted to the Washington Secretary of State. I am a member of the Secretary of State's
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DECLARATION OF MICHAEL SNYDER – 1

1 Election Administration and Certification Board and the King County Citizen's Election
2 Oversight Committee.
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5 3. I served as a lead observer for Washington Families Standing Together
6 ("WAFST") during the signature verification process conducted by the Secretary of State
7 (SOS) for Referendum 71 petitions.
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11 4. During the verification process, WAFST observers used worksheets to record
12 instances where we believed that SOS checkers had erroneously accepted signatures on
13 Referendum 71 petitions. Because state law prohibits observers from recording names on
14 petitions during the verification process, we recorded these instances by noting the volume,
15 page, and line number of signatures that we believed had been accepted in error.
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21 5. I have reviewed the worksheets completed by WAFST observers during the
22 verification process. Using the information from those worksheets, I have compiled
23 spreadsheets listing signatures that WAFST observers believed may have been accepted in
24 error by the SOS during the Referendum 71 verification process. A short explanatory memo
25 that I prepared regarding the spreadsheets is attached as Exhibit A to this declaration.
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31 **I declare under penalty of perjury under the laws of the**
32 **State of Washington that the foregoing is true and correct.**
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36 EXECUTED at Seattle, Washington, this 8th day of September, 2009.
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39 s/Michael Snyder
40 MICHAEL SNYDER
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